

1 THE HONORABLE LAUREN KING
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

8 N.D. by and through his parents and co-
9 guardians M.D. and T.D., on behalf of a class
of those similarly situated,

10 Plaintiff(s),

11 v.

12 CHRIS REYKDAL, in his capacity as the
13 SUPERINTENDENT OF PUBLIC
INSTRUCTION and OFFICE OF THE
14 SUPERINTENDENT OF PUBLIC
INSTRUCTION, a Washington State agency,

15 Defendants.

No. 2:22-cv-01621-LK

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SECOND DECLARATION OF ALEX
HAGEL IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT
AGREEMENT

I, Alex Hagel, declare as follows:

1. I am an associate with the law firm of Cedar Law PLLC, co-counsel for Plaintiffs
in this matter. I am an attorney at law duly licensed to practice before all courts of the State of
Washington. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' uncontested Second Motion for
Preliminary Approval of the Settlement Agreement.

3. On September 9, 2024, counsel for the Plaintiffs provided to OSPI a Proposed
Second Motion for Preliminary Approval. On September 13, 2024, OSPI, through counsel,
provided proposed revised edits; those edits have been incorporated into the final Motion that this
declaration accompanies.

4. Attached hereto as **Exhibit 1** is the full and complete text of the Settlement

1 Agreement.

2 5. Attached hereto as **Exhibit 2** is the proposed template for individualized notification
to class members.

3 6. Attached hereto as **Exhibit 3** is the proposed template for generalized notification
to class members.

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5 I declare under penalty of perjury under the laws of the United States of America that the foregoing
6 is true and correct.

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8 Executed on 19 September, 2024 in Auburn, Washington.

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Alex Hagel